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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 RALPH STOVALL

10 Plaintiff,

11 v.

12 TRANS UNION LLC; EQUIFAX  
13 INFORMATION SERVICES LLC; AMERICAN  
HONDA FINANCE CORPORATION,

14 Defendants.

Case No.: 2:22-cv-00079-GMN-BNW

**STIPULATION AND [PROPOSED] ORDER  
TO EXTEND DISCOVERY**

**(First Request)**

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16 Defendant AMERICAN HONDA FINANCE CORPORATION (hereinafter referred to as  
17 “AHFC”), and Plaintiff RALPH STOVALL (“Plaintiff”), by and through their respective counsel of  
18 record, hereby submit this Stipulation and [Proposed] Order to Extend Discovery. This Stipulation  
19 is made and based upon Local Rules IA 6-1 and LR 26-3.

20 The parties respectfully seek a sixty (60) day extension to the remaining deadlines in the  
21 current discovery plan and scheduling order [ECF No. 21], as the parties are attempting to resolve  
22 this case via settlement and the parties’ respective resources would be better served by continuing to  
23 explore the potential resolution of this case. Accordingly, the parties respectfully request this  
24 extension in an attempt to facilitate a potential settlement of this case.

25 **A. Current Discovery Schedule:**

- |    |   |                    |
|----|---|--------------------|
| 26 | 1. Deadline to Disclose Initial Experts:  | June 24, 2022      |
| 27 | 2. Deadline to Disclose Rebuttal Experts: | July 25, 2022      |
| 28 | 3. Discovery Cutoff Date:                 | August 23, 2022    |
|    | 4. Dispositive Motions:                   | September 22, 2022 |
|    | 5. Joint Pretrial Order:                  | October 24, 2022   |

**B. Proposed Schedule:**

The parties propose the following schedule:

- |    |  |                    |
|----|--|--------------------|
| 1. | Deadline to Disclose Initial Experts:  | August 23, 2022    |
| 2. | Deadline to Disclose Rebuttal Experts: | September 22, 2022 |
| 3. | Discovery Cutoff Date:                 | October 24, 2022   |
| 4. | Dispositive Motions:                   | November 23, 2022  |
| 5. | Joint Pretrial Order:                  | December 23, 2022  |

**C. Statement of Discovery Completed:**

The parties have completed the following discovery:

- The parties have made their respective Rule 26 disclosures of witnesses and documents.
- AHFC has responded to Plaintiff's interrogatories, requests for admission, and requests for production of documents.

**D. Discovery that Remains to be Completed:**

In the event the parties are unable to reach a settlement agreement, the parties anticipate the following remaining discovery:

- Written discovery requests from AHFC to Plaintiff.
- The Rule 30(b)(6) deposition of AHFC.
- Plaintiff's deposition.
- Disclosure of initial and rebuttal experts by both parties.
- Depositions of the parties' respective experts.

**E. Reasons for the Requested Extension and Statement of Good Cause:**

The parties respectfully submit that this request for a short extension is supported by good cause, as the parties are exploring potential settlement and resolution of this case. The requested extension will allow the parties to continue their efforts to reach a settlement without incurring discovery and expert related fees and costs.

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The parties respectfully submit that the increased fees and costs associated with experts and discovery would present a significant obstacle to the parties' settlement negotiations. Accordingly, the requested extension is supported by good cause, and is made in good faith and not intended to delay these proceedings unnecessarily.

**SO STIPULATED:**

DATED: June 24, 2022

DATED: June 24, 2022

**WILSON, ELSE, MOSKOWITZ,  
EDELMA & DICKER LLP**

**FREEDOM LAW FIRM**

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**ORDER**

**GOOD CAUSE SHOWN, IT IS HEREBY ORDERED** that the discovery scheduling order is modified as follows:

- |    |  |                    |
|----|--|--------------------|
| 1. | Deadline to Disclose Initial Experts:  | August 23, 2022    |
| 2. | Deadline to Disclose Rebuttal Experts: | September 22, 2022 |
| 3. | Discovery Cutoff Date:                 | October 24, 2022   |
| 4. | Dispositive Motions:                   | November 23, 2022  |
| 5. | Joint Pretrial Order:                  | December 23, 2022  |

Dated this 29th day of June, 2022.

  
UNITED STATES MAGISTRATE JUDGE